

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

September 22, 2008

TO: Internal File

THRU: James D. Smith, Permit Supervisor *DS 10/10/08*

FROM: Steve Christensen, Environmental Scientist III *SKC*

RE: Bath House Parking Lot Expansion, CO-OP Mining Company, Bear Canyon Mine, C/015/0025, Task ID #3016

SUMMARY:

On July 21st, 2008 the Division of Oil, Gas and Mining (the Division) received an amendment to the Bear Canyon Mine MRP from CO-OP Mining Company (the Permittee). The amendment proposes to expand it's current parking area to accommodate its work force. Currently, there is not adequate parking space. In addition, there are safety issues with the roadway entering the parking area, as it is not wide enough to allow two-way travel.

Due to the proximity of the parking lot expansion to Bear Creek, the Permittee has proposed expanding the parking lot to the west and south so as to minimize the potential for impacts to the drainage. The amendment constitutes an incidental boundary change in order to facilitate the expansion of the parking lot.

The submittal letter dated July 15h, 2008 discusses the elimination of water bar D-8D and the installation of a culvert C-14D. Culvert C-14D has already been approved and installed under an expedited basis.

The application does not meet the requirements of the State of Utah R645-Coal Mining Rules. The following deficiencies must be addressed prior to Division approval:

R645-301-120: The Permittee must address the apparent pagination discrepancy with page 7-135 of the submittal. Page 7-135 of the submittal appears to correspond to page 7-106 in the approved MRP.

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R645-301-120: The Permittee should modify the language on page 7-135 that describes culvert C-14D. The language should make it clear to the reader as to what is currently in use at the site. Future tense is utilized in describing the 8" concrete slab associated with the removed water bar.

R645-301-742.220, -221.31, -221.3 and -221.33: The Permittee must update the Sediment Pond C calculations within Appendix 7-F of the MRP. The Permittee must demonstrate that Sediment Pond C has the storage capacity to handle the increase in storm water volume that will be generated from the parking lot expansion.

TECHNICAL ANALYSIS:

GENERAL CONTENTS

PERMIT APPLICATION FORMAT AND CONTENTS

Regulatory Reference: 30 CFR 777.11; R645-301-120.

Analysis:

The application does not meet the Permit Application Format and Contents requirements of the State of Utah R645-Coal Mining Rules.

Page 7-135 of the submittal is page 7-106 in the MRP. The Permittee

Findings:

The application does not meet the Permit Application Format and Contents requirements of the State of Utah R645-Coal Mining Rules. The following deficiency must be addressed prior to Division approval of the amendment:

R645-301-120: The Permittee must address the apparent pagination discrepancy with page 7-135 of the submittal. Page 7-135 of the submittal appears to correspond to page 7-106 in the approved MRP.

R645-301-120: The Permittee should modify the language on page 7-135 that describes culvert C-14D. The language should make it clear to the reader as to what is currently in use at the site. Future tense is utilized in describing the 8" concrete slab associated with the removed water bar.

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

Siltation Structures: Sedimentation Ponds

The application does not meet the Siltation Structures: Sedimentation Pond requirements of the State of Utah R645-Coal Mining Rules.

In order to facilitate the expansion of the bathhouse parking lot, the area of watershed AD-15 (see Plate 7-1B, Hydrology Map) was increased 0.36 acres. The additional area being added to AD-15 is accounted for in Table 7-23, *Summary of Storm Runoff Calculations for 10 Year 6 Hour Storm*. However, the submitted application did not provide the discussion/calculations to demonstrate that Sediment Pond C has the storage capacity to handle the increased storm water volume that will be generated from the expanded parking lot.

Findings:

The application does not meet the Siltation Structures: Sedimentation Pond requirements of the State of Utah R645-Coal Mining Rules. The following deficiency must be addressed prior to Division approval:

R645-301-742.220, -221.31, -221.3 and -221.33: The Permittee must update the Sediment Pond C calculations within Appendix 7-F of the MRP. The Permittee must demonstrate that Sediment Pond C has the storage capacity to handle the increase in storm water volume that will be generated from the parking lot expansion.

RECOMMENDATIONS:

The application should not be approved at this time.